

for an extension of the deadline by which CRU must file a response to Plaintiffs' Motion for Notice. *See generally id.*

2. On December 19, 2023, Plaintiffs filed their Response to Defendants' Emergency Motion to Compel Discovery and to Extend Deadline to File Response in Opposition to Plaintiffs' Motion for Notice ("EM Response"). *See* Dkt. 47. In their EM Response, Plaintiffs argue that they should not be responsible for producing materials that they previously committed to produce because doing so would be too time-consuming and, from their perspective, the additional materials sought are not relevant to CRU's forthcoming response to Plaintiffs' Motion for Notice. *See generally id.*

3. CRU respectfully requests leave to file new evidence with the Reply in Support of Their Emergency Motion to Compel and to Extend Deadline to File Their Response in Opposition to Plaintiffs' Motion for Notice so that they can attach evidence to (1) refute Plaintiffs' new argument that producing the requested discovery would be too time-consuming, and (2) to disprove Plaintiffs' claim that the requested discovery, which they previously agreed to produce, is now not relevant to CRU's forthcoming response to Plaintiffs' Motion for Notice.

4. Plaintiffs are opposed to the relief sought in this Motion.

PRAYER

For all these reasons, CRU respectfully requests permission to file relevant and new evidence with their Reply, which is being filed immediately following this Motion, in accordance with LR CV-7(k).

Respectfully submitted,

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CERTIFICATE OF CONFERENCE

On December 22, 2023, I discussed the relief sought herein with Plaintiffs' counsel. Plaintiffs' counsel has communicated that Plaintiffs are opposed to the relief sought herein.

Monte K. Hurst
Monte K. Hurst

CERTIFICATE OF SERVICE

I certify that on December 26, 2023, I served a copy of the foregoing document on Plaintiffs' counsel as follows in compliance with Rule 5(b) of the Federal Rules of Civil Procedure:

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